

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

VIRGINIA COLE *on behalf of herself and*
CHothers similarly situated,

Plaintiff,

v.

C/T INSTALL AMERICA, LLC

Defendant.

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Civil Action No.: 5:25-cv-03531-

Class Action Complaint

Jury Trial Demanded

DECLARATION OF VIRGINIA COLE

I, Virginia Cole, declare under penalty of perjury as follows:

1. I am the Plaintiff in this action. I make this declaration based on my own personal knowledge, and if called upon to testify, I could and would testify competently to the matters stated herein.

2. I am an older individual and have never used my cell phone number for business or commercial purposes. I use my cell phone exclusively for personal, family, and household reasons.

3. On May 8, 2024, my prior cell phone, which used the number ending in 8353, was destroyed during a severe storm.

4. The following week, on May 13, 2024, I went to my wireless carrier to obtain a replacement device. My carrier explained that it would be more reasonable and economical to issue me a new number with a new device. I accepted their recommendation, and I was assigned a new cellular telephone number ending in 7615.

5. Since obtaining this new number, I have been its sole and regular user. I do not share the number with anyone else, and it is my only active personal telephone number.

6. On May 15, 2024, I registered my new number on the National Do Not Call Registry. I did this immediately because I value my privacy and do not want to receive unsolicited telemarketing calls.

7. I use my cellular phone ending in 7615 for ordinary household and personal matters, including speaking with friends and family members, receiving calls from my doctors, scheduling household services, staying in touch with church members, sending and receiving personal text messages, and other daily activities. I do not and have never used this number for work, business, or commercial purposes.

8. At the time I received the telemarketing calls at issue in this case, my number ending in 7615 was my personal residential telephone number. I did not maintain any landline service at my residence, and my cell phone was my only telephone line.

9. Before my new number, I previously had another cell number ending in 8353. That number was also used exclusively for residential and personal purposes, and I registered it on the Do Not Call Registry on April 5, 2023. When my phone was destroyed in May 2024, I no longer used or maintained the 8353 number, and it was replaced by my new 7615 number.

10. I currently maintain only one active personal telephone number—the 7615 number—and it remains registered on the National Do Not Call Registry.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13 day of September, 2025.



Virginia Cole